## 



## **U.S. Department of Justice**

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

March 18, 2021

## **VIA ECF AND EMAIL**

Honorable Lorna B. Schofield United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: United States v. Sohrab Sharma et al., 18 Cr. 340 (LGS)

Dear Judge Schofield:

Pursuant to the Court's March 8, 2021 Opinion and Order in this case, seven victims of the defendants' fraud on Centra Tech, Inc. investors (the "Claimants") moved on March 15, 2021 for leave to file an accompanying proposed 150-page amended petition pursuant to 21 U.S.C. § 853(n) (consisting of a 36-page amended pleading with approximately 110 pages of exhibits). In their proposed amended petition, Claimants assert claims to a portion of the 100,000 Ether units in fraud proceeds that defendant Sharma forfeited his legal interest in to the Government. The Government respectfully requests, with the consent of the Claimants through their counsel, that the Court expand the number of pages afforded for the Government's response due March 22, 2021 from five to eight single-spaced pages, and expand the number of pages afforded for the Claimants' reply due March 25, 2021 from two to five single-spaced pages. As noted, the Claimants consent to the Government's request, and the Government consents to the Claimants' corresponding page limit expansion request.

The Government and Claimants will endeavor to refrain from repeating background in prior briefing and to keep our respective response and reply filings as concise as possible. If the Court has any questions, counsel for the Government and for Claimants are available at the Court's convenience.

Respectfully submitted,

ILAN T. GRAFF Attorney for the United States Acting Under 28 U.S.C. § 515

by: \_/s/\_ Samson Enzer / Negar Tekeei / Daniel Loss Assistant United States Attorneys

212-637-2342 / -2482 / -6527

cc: Donald J. Enright, Esq.
All other counsel of record